

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISON**

**JOE RICHARD “TREY” POOL,
III, TRENTON DONN “TRENT”
POOL, and ACCELEVATE2020,
LLC,**

Plaintiffs,

V.

**CITY OF HOUSTON and ANNA
RUSSELL, in her official capacity as
Secretary of the City of Houston**

Defendants.



CIVIL ACTION

No. 19-CV-2236

**DEFENDANTS CITY OF HOUSTON’S AND ANNA RUSSELL’S
UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO MOTION FOR LEAVE
TO FILE SECOND AMENDED COMPLAINT**

Defendants, the City of Houston (“Houston”), and Anna Russell,¹ the former City Secretary sued in her official capacity, (collectively “the City”), file this Unopposed Motion for Extension of Time to File Response to Motion for Leave to File Second Amended Complaint (Dkt #52), seeking a seven-day extension. In support of its Motion, the City states the following:

The City respectfully seeks a seven-day extension of time to file its response to Pool's Motion for Leave to File Second Amended Complaint. The requested extension, which is unopposed, would make the City's response due on April 30, 2021. Both counsel

¹ Ms. Russell is deceased.

for the City are and have been involved in a large, emergency matter that has involved extensive briefing and evidentiary work to further prepare the case for disposition.

This request for a seven-day extension is unopposed. It is not made for purposes of delay but only so justice can be done.

For the reasons stated herein, Defendants respectfully request that this Court grant Defendants' Unopposed Motion for Extension of Time to File Response to Motion for Leave to File Second Amended Complaint and allow the City to file its response on April 30, 2021, and award Houston such other relief as to which the Court finds it entitled.

Respectfully submitted,

ARTURO G. MICHEL
City Attorney

SUZANNE R. CHAUVIN
Chief, General Litigation Section

By: /s/ Suzanne R. Chauvin
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*Attorneys for Defendants
City of Houston and Anna
Russell, in her official capacity
as Secretary for the City of Houston*

CERTIFICATE OF CONFERENCE

I certify that on April 20, 2021, Counsel for Plaintiffs was contacted by Suzanne Chauvin with regard to the requested extension. Plaintiffs' Counsel stated that he is unopposed to this Motion.

/s/ Suzanne R. Chauvin

Suzanne R. Chauvin

CERTIFICATE OF SERVICE

I certify that on April 22, 2021, a copy of the foregoing Defendants City of Houston and Anna Russell's Unopposed Motion for Extension of Time to File Response to Plaintiff's Motion for Leave to File Second Amended Complaint was served electronically on the CM/ECF system which will automatically serve an electronic notice on the following counsel of record for Plaintiffs:

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/s/ Suzanne R. Chauvin

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